

# **EXHIBIT 6**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE )  
ANTITRUST LITIGATION )  
 ) No. 11-CV-2509-LHK  
THIS DOCUMENT RELATES TO: )  
ALL ACTIONS. )

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DEPOSITION OF 30(b)(6) WITNESS: APPLE  
(STEVEN BURMEISTER)

CONFIDENTIAL - ATTORNEYS' EYES ONLY

June 27, 2012

Reported by: Anne Torreano, CSR No. 10520

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1 STEVEN BURMEISTER,  
2 having been duly sworn to tell the truth, testified as  
3 follows:

4 EXAMINATION

5 BY MR. FORDERER:

6 Q. Good morning.

7 A. Good morning.

8 Q. It's my understanding that you're here to  
9 testify in response to plaintiff's notice under Rule  
10 30(b)(6).

11 Is that your understanding?

12 A. Sections of the 30(b)(6), yes.

13 Q. Okay.

14 MR. FORDERER: I want to introduce Apple's  
15 objections and responses to that notice. I believe  
16 this will be Plaintiff's Exhibit 57.

17 (PLAINTIFFS' EXHIBIT 57 MARKED.)

18 BY MR. FORDERER:

19 Q. Have you seen this document before?

20 A. Yes.

21 Q. I want to direct to you page 4 of the  
22 document. You see the paragraph right above where it  
23 says topic No. 2? It states, "Apple responds that it  
24 will designate one or more witnesses to testify on its  
25 behalf regarding the identity and general contents of

1 databases containing recruiting, hiring and  
2 compensation data for U.S. salaried employees between  
3 January 1, 2001 and February 1, 2012 that the parties  
4 agreed would be produced in this case."

5 Do you see that?

6 A. Yes.

7 Q. My first question to you is, are you prepared  
8 today to discuss the identity and general contents of  
9 databases containing recruiting data?

10 A. No.

11 Q. Are you prepared today to identify or to  
12 discuss the general contents of databases containing  
13 any hiring data?

14 A. No.

15 Q. What about compensation data?

16 A. Elements of the compensation data, yes.

17 Q. What elements?

18 A. I'm prepared to discuss stock-based  
19 compensation and bonus data.

20 Q. Anything else?

21 A. Not specifically that I've prepared for.

22 Q. I want to direct you to page 5 of the same  
23 exhibit.

24 A. Let me get my glasses.

25 Q. Sure. No problem.

1           On page 5 do you see in the last paragraph a  
2           reference to plaintiff's May 15th, 2012 letter?

3           A.     Yes.

4           MR. FORDERER: I want to introduce that letter  
5           as Exhibit -- Plaintiff's Exhibit 58.

6           And I've included the letter, but I'm going to  
7           be focusing on the attachments. So does Counsel have a  
8           preference as to whether or not I include the letter or  
9           just the attachment in the exhibit?

10          MR. RILEY: I think the attachment would be  
11          fine.

12          MR. FORDERER: Attachment only?

13          MR. RILEY: Yeah.

14          MR. FORDERER: Okay.

15          (PLAINTIFFS' EXHIBIT 58 MARKED.)

16          BY MR. FORDERER:

17          Q.     Have you seen this document before?

18          A.     I have not seen this specific document.

19          Q.     Do you want to take a quick second to look  
20          through it and see if any of the sections ring a bell?

21                 For example, big Roman number I C, I'm sorry  
22          that this document doesn't have page numbers, but the  
23          title is "Questions below relate to the file," and then  
24          document number ending 4328.

25          A.     Yes.

## 1 REPORTER'S CERTIFICATE

2  
3 I, Anne Torreano, Certified Shorthand  
4 Reporter for the State of California, do hereby  
5 certify: That the witness named in the foregoing  
6 Deposition was by me duly sworn; that the deposition  
7 was then taken before me at the time and place herein  
8 set forth; that the testimony and proceedings were  
9 reported stenographically by me and were transcribed  
10 through computerized transcription by me; that the  
11 foregoing is a true record of the testimony and  
12 proceedings taken at that time; and that I am not  
13 interested in the event of the action.

14 Witness my hand dated July 10, 2012.

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18 ANNE M. TORREANO, CSR NO. 10520  
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